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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 SAMUEL ACEVEDO,

9 Plaintiff,

10 v.

11 EQUIFAX INFORMATION SERVICES, LLC;
12 EXPERIAN INFORMATION SOLUTIONS,
13 INC.; CLARITY SERVICES, INC.; FIRST
14 SAVINGS BANK; NEW YORK STATE
15 CHILD SUPPORT SERVICES; WEBBANK;
16 and CITIBANK, N.A.,

17 Defendants.

Case No.: 2:24-CV-01132-JCM-NJK

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT
(Second Request)**

17 Defendant identified as WebBank, by and through its undersigned counsel, and reserving
18 its right to assert any and all rights and/or defenses to this action, hereby files this Unopposed
19 Motion for Extension of Time to Respond to Complaint, and in support states as follows:

20 1. On July 10, 2024, WebBank filed its first Unopposed Motion to Extend Deadline
21 to Respond to Plaintiff's Complaint, which explained that: (i) as soon as WebBank became aware
22 of the Complaint, it endeavored to retain counsel for the defense of this matter, and retained
23 undersigned counsel the week of WebBank's then-deadline to respond to the Complaint; and (ii)
24 because WebBank and its newly retained counsel were continuing to undertake their good faith
25 investigation into Plaintiff's allegations, prepare an appropriate response, and/or confer with
26 Plaintiff's counsel regarding potential resolution, WebBank respectfully requested that its
27 responsive pleading deadline be extended until August 14, 2024.

28 2. On July 11, 2024, this Court granted WebBank's first Unopposed Motion to Extend

1 Deadline to Respond to Plaintiff's Complaint, and as a result, WebBank's responsive pleading
2 deadline is currently August 14, 2024.

3 3. Since this Court granted WebBank's first Unopposed Motion to Extend Deadline
4 to Respond to Plaintiff's Complaint, counsel for WebBank and counsel for Plaintiff have
5 exchanged information relevant to Plaintiff's allegations and also had preliminary settlement
6 discussions. In fact, on August 8, 2024, counsel for Plaintiff provided counsel for WebBank with
7 certain information relevant to Plaintiff's allegations. WebBank needs time to review and assess
8 this information. Moreover, additional time would assist in furthering the parties' ongoing
9 settlement discussions. As such, WebBank respectfully requests that its responsive pleading
10 deadline be extended until September 13, 2024.

11 4. Counsel for WebBank has contacted counsel for Plaintiff regarding the requested
12 extension, and counsel for Plaintiff has consented to the same. As such, no party will be prejudiced
13 by this Court granting the relief sought in this Motion.

14 5. This is the second request for an extension of time for WebBank to file its
15 responsive pleading. The extension is requested in good faith and is not for purposes of delay or
16 prejudice to any other party.

17 6. This Motion is filed in good faith and not for purposes of delay.

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1 WHEREFORE, WebBank respectfully requests that this Court enter an Order granting its
2 Unopposed Motion for Extension of Time to Respond to Complaint and providing WebBank a 30-
3 day extension, through and including September 13, 2024, to respond to the Complaint.

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5 DATED this 13th day of August, 2024.

6 WRIGHT, FINLAY & ZAK, LLP

7
8 /s/ Ramir M. Hernandez

9 Ramir M. Hernandez, Esq., NV Bar #13146
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11 Las Vegas, Nevada 89117
12 *Attorneys for Defendant WebBank*
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16 IT IS SO ORDERED:

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19 United States Magistrate Judge

20 DATED: August 13, 2024
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